

Permitting decisions

Partial Surrender and Variation

We have decided to grant the variation and partial surrender for Keinton Rearing Farm operated by Ridgeway Foods Limited.

The variation number is [EPR/XP3739RK/V005](#).

The partial surrender number is [EPR/XP3739RK/Q006](#).

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision-making process. It summarises the decision-making process in the decision checklist to show how all relevant factors have been taken into account.

This decision document provides a record of the decision-making process. It:

- highlights [key issues](#) in the determination
- summarises the decision-making process in the [decision checklist](#) to show how all relevant factors have been taken into account

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the variation notice. The introductory note summarises what the variation covers.

Key issues of the decision

Variation and Partial surrender application details

This variation amends the proposals permitted in the previous variation EPR/XP3739RK/V004. The previous variation permitted the addition of 4 poultry houses located approximately 150m south of the existing poultry house. This proposal has now been amended and the Operator will now house the birds in an additional two houses located immediately to the east of the existing poultry house. There are no changes to bird place numbers. The existing house will be refurbished, with side extraction fans to be replaced by high velocity roof fans. The partial surrender also facilitates the surrender of an unused piece of land where the 4 poultry houses referred to above were planned to be built.

New Intensive Rearing of Poultry or Pigs BAT Conclusions document

The new Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) was published on the 21st February 2017. There is now a separate BAT Conclusions document which will set out the standards that permitted farms will have to meet.

The BAT Conclusions document is as per the following link

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D0302&from=EN>

Now the BAT Conclusions are published **all new housing within variation applications** issued after the 21st February 2017 must be compliant in full from the first day of operation.

There are some new requirements for permit holders. The conclusions include BAT Associated Emission Levels for ammonia emissions which will apply to the majority of permits, as well as BAT associated levels for nitrogen and phosphorous excretion.

For some types of rearing practices stricter standards will apply to farms and housing permitted after the new BAT Conclusions are published.

This variation determination includes a review only of BAT compliance for new housing introduced with this variation.

New BAT conclusions review

There are 34 BAT conclusion measures in total within the BAT conclusion document dated 21st February 2017.

The Applicant has confirmed their compliance with all BAT conditions for the new housing, in their document reference 'proposed changes' and 'Keinton Farm'.

The following is a more specific review of the measures the Applicant has applied to ensure compliance with the above key BAT measures.

BAT measure	Applicant compliance measure
BAT 25 Monitoring of emissions and process parameters - Ammonia emissions	Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 26 Monitoring of emissions and process parameters - Odour emissions	The site already has an approved OMP which has been amended to account for the new housing arrangement. The OMP includes the following details for on farm monitoring and continual improvement: - On a daily basis odour levels at the installation will be monitored for high housekeeping odours. - Ventilation system is regularly adjusted to match the age and requirements of the

BAT measure	Applicant compliance measure
	<p>flock.</p> <ul style="list-style-type: none"> - De littering takes place within 24 hours of de stocking. Following cleanout litter is placed in trailers under cover, prior to removal off site. - Houses sealed whilst waiting litter removal. - Carcasses placed in sealed plastic bags and stored in sealed containers. Regularly collected and removed from the site (3-5 times per week). - Wet litter avoidance techniques employed including use of nipple drinkers. Insulated walls and ceilings to avoid condensation, optimisation of stocking levels to avoid overcrowding.
<p>BAT 27 Monitoring of emissions and process parameters</p> <p>-Dust emissions</p>	<p>Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions.</p> <p>The Applicant has confirmed they will report the dust emissions to the Environment Agency annually by multiplying the dust emissions factor for broilers by the number of birds on site.</p>
<p>BAT 31 Ammonia emissions from poultry houses</p> <p>-Pullets</p>	<p>There is no BAT AEL to be complied with.</p> <p>In order to reduce ammonia emission from air from each house for pullets, the Operator has confirmed that the new housing will use technique 4, Manure belts. Combined with technique 5, Forced drying of litter using indoor air (in case of solid floor with deep litter).</p>

More detailed assessment of specific BAT measures

Ammonia emission controls

A BAT Associated Emission Level (AEL) provides us with a performance benchmark to determine whether an activity is BAT. The BAT Conclusions document does not have a BAT AEL pullets and therefore an ammonia emission limit value has not been included within the permit.

Industrial Emissions Directive (IED)

This permit implements the requirements of the European Union Directive on Industrial Emissions.

Groundwater and soil monitoring

As a result of the requirements of the Industrial Emissions Directive, all permits are now required to contain a condition relating to protection of soil, groundwater, and groundwater monitoring. However, the Environment Agency's H5 Guidance states **that it is only necessary for the operator to take samples** of soil or groundwater and measure levels of contamination where there is evidence that there is, or could be existing contamination and:

- The environmental risk assessment has identified that the same contaminants are a particular hazard; or
- The environmental risk assessment has identified that the same contaminants are a hazard, and the risk assessment has identified a possible pathway to land or groundwater.

H5 Guidance further states that it is **not essential for the Operator** to take samples of soil or groundwater and measure levels of contamination where:

- The environmental risk assessment identifies no hazards to land or groundwater; or
- Where the environmental risk assessment identifies only limited hazards to land and groundwater and there is no reason to believe that there could be historic contamination by those substances that present the hazard; or

- Where the environmental risk assessment identifies hazards to land and groundwater but there is evidence that there is no historic contamination by those substances that pose the hazard.

The site condition report (SCR) for Keinton rearing farm (received with part surrender and variation application) demonstrates that there are no hazards or likely pathway to land or groundwater and no historic contamination on site that may present a hazard from the same contaminants. **Therefore, based on the risk assessment presented in the SCR, we accept that they have not provided base line reference data for the soil and groundwater at the site at this stage and although condition 3.1.3 is included in the permit no groundwater monitoring will be required.**

Partial surrender

The site condition report for the surrendered parts of the installation confirms there were no recorded incidents of spills or leaks of polluting material during the lifetime of the permit.

Odour

Intensive farming is by its nature a potentially odorous activity. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance (http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297084/geho0110brsb-e-e.pdf).

Condition 3.3 of the environmental permit reads as follows:

“Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.”

Under section 3.3 of the guidance an Odour Management Plan (OMP) is required to be approved as part of the permitting process, if as is the case here, sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the Installation boundary. It is appropriate to require an OMP when such sensitive receptors have been identified within 400m of the installation to prevent, or where that is not practicable, to minimise the risk of pollution from odour emissions.

The risk assessment for the Installation provided with the Application lists key potential risks of odour pollution beyond the Installation boundary. These activities are as follows:

- Manufacture and selection of feed
- Feed delivery and storage
- Ventilation and heating systems/dust
- Litter management
- Carcase disposal
- House clean out
- Used litter
- Washing operations including vehicles
- Fugitive emissions
- Dirty water management
- Abnormal operations
- Waste production/storage
- Materials/storage

Odour Management Plan Review

The Installation is located within 400m of a number of sensitive receptors, as listed within the OMP (please note, the distances stated are only an approximation from the Installation boundary to the assumed boundary of the properties):

The operator has provided an OMP (submitted with the application), and this has been assessed against the requirements of 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 (version 2), Appendix 4 guidance 'Odour Management at Intensive Livestock Installations' and our Top Tips Guidance and Poultry Industry Good Practice Checklist (August 2013) as well as the site-specific circumstances at the Installation. We consider that the OMP is acceptable because it complies with the above guidance, with details of odour control measures, contingency measures and complaint procedures described below.

The Operator is required to manage activities at the Installation in accordance with condition 3.3.1 of the Permit and its OMP. The OMP includes odour control measures, in particular, procedural controls such as manufacture and selection of feed, feed delivery and storage, ventilation and heating systems, litter management, carcass disposal, house clean out, used litter, washing operations, fugitive emissions, dirty water management, abnormal operations, waste production storage and materials storage. The operator has identified the potential sources of odour (see risks bullet pointed above), as well as the potential risks and problems, and detailed actions taken to minimise odour including contingencies for abnormal operations.

The OMP also provides a suitable procedure in the event that complaints are made to the Operator. The OMP is required to be reviewed at least every year (as committed to in the OMP) and/or after a complaint is received, whichever is the sooner. It is important to note that the site has an existing OMP which has been amended to consider the new housing arrangement. The site has no history of odour complaints, and we are satisfied that the existing odour control techniques are appropriate. We are therefore satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise odour and to prevent pollution from odour

The Environment Agency has reviewed the OMP and considers it complies with the requirements of our H4 Odour management guidance note. We agree with the scope and suitability of key measures, but this should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and sufficient. That remains the responsibility of the Operator.

Conclusion

Although there is the potential for odour pollution from the Installation, the Operator's compliance with the Permit and its OMP will minimise the risk of odour pollution beyond the Installation boundary. The risk of odour pollution at sensitive receptors beyond the Installation boundary is therefore not considered significant.

Noise

Intensive farming by its nature involves activities that have the potential to cause noise pollution. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance. Under section 3.4 of this guidance a Noise Management Plan (NMP) must be approved as part of the permitting determination if there are sensitive receptors within 400m of the Installation boundary.

Condition 3.4 of the Permit reads as follows:

Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable to minimise the noise and vibration.

There are sensitive receptors within 400 metres of the Installation boundary as stated in the odour section above. The Operator has provided a noise management plan (NMP) as part of the Application supporting documentation, and further details are provided below.

The risk assessment for the Installation provided with the Application lists key potential risks of noise pollution beyond the Installation boundary. These activities are as follows:

- Ventilation fans
- Feed/fuel deliveries
- Alarm systems
- Bird catching
- Clean out operations

- Standby generator

Noise Management Plan Review

The sensitive receptors that have been considered under odour and noise do not include the operator's property and other people associated with the farm operations as odour and noise are amenity issues.

A noise management plan (NMP) has been provided by the operator as part of the application supporting documentation.

The NMP also provides a suitable procedure in the event of complaints in relation to noise. The NMP is required to be reviewed at least every year (as committed to in the NMP), however the operator has confirmed that it will be reviewed if a complaint is received, whichever is sooner.

Operations with the most potential to cause noise nuisance have been assessed and control measures put in place for all vehicles accessing the site and manoeuvring around, vehicles and machinery carrying out operations on site. This includes the delivering of feed and birds, and to remove used litter and dirty water. Other operations with the potential to cause noise nuisance for which control measures have been put in place include ventilation fans, feeding equipment, alarm system and stand-by generator, building works and repairs, and animal noise.

We have included our standard noise and vibration condition 3.4.1 in the Permit, which requires that emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the Operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan (which is captured through condition 2.3 and Table S1.2 of the Permit), to prevent or where that is not practicable to minimise the noise and vibration.

We are satisfied that the manner in which operations are carried out on the Installation will minimise the risk of noise pollution.

Conclusion

We have assessed the NMP and the H1 risk assessment for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 'Noise management at intensive livestock installations'. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution / nuisance. It is important to note that the Operator already has a noise management plan. The plan has been reviewed by the Operator to account for the new housing arrangement. The site has no history of noise complaints, and we are satisfied that the existing noise control techniques are appropriate. We are therefore satisfied that appropriate measures will be in place to prevent or where that is not practicable to minimise noise and vibration and to prevent pollution from noise and vibration outside the installation boundary.

Dust and Bio aerosols

The use of Best Available Techniques and good practice will ensure minimisation of emissions. There are measures included within the Permit (the 'Fugitive Emissions' conditions) to provide a level of protection. Condition 3.2.1 'Emissions of substances not controlled by an emission limit' is included in the Permit. This is used in conjunction with condition 3.2.2 which states that in the event of fugitive emissions causing pollution following commissioning of the Installation, the Operator is required to undertake a review of site activities, provide an emissions management plan and to undertake any mitigation recommended as part of that report, once agreed in writing with the Environment Agency.

There are two sensitive receptors within 100m of the Installation boundary, which are adjacent to the Installation boundary, to the south of the poultry houses – approximately at grid reference 354770,129214 and 354783,129204.

Guidance on our website concludes that applicants need to produce and submit a dust and bio aerosol risk assessment with their applications only if there are relevant receptors within 100 metres of their farm, e.g., the farmhouse or farm worker's houses. Details can be found via the link below:

www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols.

As there are receptors within 100m of the Installation, the Applicant was required to submit a dust and bio aerosol risk assessment in this format.

In the guidance mentioned above it states that particulate concentrations fall off rapidly with distance from the emitting source. This fact, together with the proposed good management of the Installation such as keeping areas clean from build-up of dust, and other measures in place to reduce dust and risk of spillages (e.g., litter and feed management/delivery procedures) all reduce the potential for emissions impacting the nearest receptors.

The site already has an approved dust and bio-aerosol management plan. This document has been reviewed by the Operator to account for the new housing arrangement. The site has no history of bio-aerosol/dust issues, and we are satisfied that the existing control techniques are appropriate.

The Applicant has confirmed the following measures (for full control measures please refer to the relevant plan) in their operating techniques to reduce dust, which will inherently reduce bio aerosols:

- Covers placed over silo feed pipes when not in use
- No milling undertaken on site
- Wood shavings have dust removed prior to delivery
- Ventilation is computer controlled using manufacturer's specifications
- High velocity roof fans prevent dust from depositing on the roof and facilitating dispersion
- Areas where dust can settle in the poultry houses are cleaned between flocks

Conclusion

We are satisfied that the measures outlined in the Application will minimise the potential for dust and bio aerosol emissions from the Installation.

Ammonia

The applicant has demonstrated that the housing will meet the relevant NH₃ BAT-AEL.

There are five Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also nine Local Wildlife Site(s) (LWS), /Ancient Woodland(s) (AW), Local Nature Reserve(s) (LNR) within 2 km of the installation.

Ammonia assessment – SSSI

The following trigger thresholds have been applied for assessment of SSSIs:

- If the process contribution (PC) is below 20% of the relevant critical level (CL_e) or critical load (CL_o) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required. An in-combination assessment will be completed to establish the combined PC for all existing farms identified within 5 km of the SSSI.

Initial screening using the ammonia screening tool version 4.6 has indicated that emissions from Keinton Rearing Farm will only have a potential impact on SSSI site(s) with a precautionary critical level of 1µg/m³ if they are within 1930 metres of the emission source.

Beyond 1930m the PC is less than 0.2µg/m³ (i.e., less than 20% of the precautionary 1µg/m³ critical level) and therefore beyond this distance the PC is insignificant. In this case the SSSI(s) are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of 1µg/m³ is used, and the process contribution is assessed to be less than 20% the site automatically screens out as insignificant and no further assessment of critical load is necessary. In this case the 1µg/m³ level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely damage to these sites.

Table 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
Great Breach and Copley Woods	4740
East Polden Grasslands	1989
Hurcott Farm	3394

Screening using the ammonia screening tool version 4.6 has indicated that the PC for Babcarry Meadows SSSI is predicted to be less than 20% of the critical level for ammonia emissions/nitrogen deposition/acid deposition therefore it is possible to conclude no damage. The results of the ammonia screening tool version 4.6 are given in the tables below.

Table 2 – Ammonia emissions

Site	Ammonia Cle (µg/m ³)	PC (µg/m ³)	PC % critical level
Babcarry Meadows SSSI	3*	0.264	8.8

* APIS states that no lichens or bryophytes are available and advises a Cle3 is appropriate – July 2022.

Table 3 – Nitrogen deposition

Site	Critical load kg N/ha/yr*	PC kg N/ha/yr.	PC % critical load
Babcarry Meadows SSSI	20	1.373	6.9

* Critical load values taken from APIS website (www.apis.ac.uk) – July 2022.

Table 4 – Acid deposition

Site	Critical load keq/ha/yr*	PC keq/ha/yr.	PC % critical load
Babcarry Meadows SSSI	4.395	0.098	2.2

* Critical load values taken from APIS website (www.apis.ac.uk) – July 2022.

Kingweston Meadows SSSI

When carrying out the screening assessment, one site - Kingweston Meadows SSSI – returned results where the PC as a % of the critical level of ammonia was between Y&Z% (20-50%) – AST returned results of 23.2%. This would normally trigger the need to carry out an in-combination assessment, which in this case, would require detailed modelling to be carried out, because there is one farm acting in-combination, taking the PC as a % of the critical level of ammonia above 50%. However, we have examined the case in greater detail and deemed it not necessary to request detailed modelling with this application. We have compared the current permitted scenario (142,000 pullets using an emission factor of 0.025kgNH₃/animal place/year (this is because the previous scenario were for colony cages) and 142,000 pullets using an emission factor of 0.06kgNH₃/animal place/year, split across five houses (142,000 pullets in house 1 (the northern house) and 142,000 pullets in houses 2-5 (the southern houses)) with the proposed scenario (284,000 pullets using an emission factor of 0.06, split across three houses all adjacent to one another). We have factored in other information: the location of the houses, the ventilation, and the fact that detailed modelling (dated 20th July 2017) was done in support of a previous application (V003), which showed that the process contributions (for 284,000 pullets) at all habitats were brought down below the respective thresholds. Underpinning all this is the fact that when you screen for 284,000 pullets at 0.06kgNH₃/animal place/year, with high velocity roof fans, all sites screen out apart from

Kingweston Meadows SSSI, which is 841m to the north west and very likely to model out below 20% as it is only just over the relevant threshold (23.2%) using ASTv4.6 (which is by nature, very precautionary) and not downwind of the predominant wind direction shown in the modelling provided with V003. The modelling for V003 was based on 0.06kgNH₃/animal place/year for 142,000 birds and 0.025 for 142,000 birds, but this was using side fans (not high velocity roof fans). A simple mass balance shows the emissions for the current proposal of 17,040kgNH₃/year, and for V003 of 12,070kgNH₃/year and it is possible to factor the difference as follows and determine the likely modelling results: 17040/12070 = 1.4. The modelling provided with V003 show a process contribution of 7.3% for ammonia concentration (receptor 18 at the SSSI in the modelling report, which is approximately the closest point to the Installation) so if factored up it would still be well below 20%. Furthermore, this does not consider that the operator is now proposing to install high velocity roof fans, which will further bring the process contributions down by increasing dispersion.

No further assessment is required.

Ammonia assessment - LWS/AW/LNR

The following trigger thresholds have been applied for the assessment of these sites:

- If the process contribution (PC) is below 100% of the relevant critical level (CLE) or critical load (CLo) then the farm can be permitted with no further assessment.

Initial screening using ammonia screening tool version 4.6 has indicated that emissions from Keinton Rearing Farm will only have a potential impact on the LWS/AW sites with a precautionary critical level of 1µg/m³ if they are within 662 metres of the emission source.

Beyond 662m the PC is less than 1µg/m³ and therefore beyond this distance the PC is insignificant. In this case the LWS/AW are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 5 – LWS/AW Assessment

Name of LWS/AW	Distance from site (m)
Babcary Copse	1047
Humps 'n' Hollows	1898
Lydford Lane	1794
Combe Lane Embankment	970
Station Quarry	984
Luns Hill Wood	1494
River Cary	1190
BABCARY COPSE	1047

Screening using the ammonia screening tool version 4.6 has determined that the PC on the LWS/AW for ammonia emissions/nitrogen deposition/acid deposition from the application site are under the 100% significance threshold and can be screened out as having no likely significant effect. See results below.

Table 6 - Ammonia emissions

Site	Critical level ammonia µg/m³	Predicted PC µg/m³	PC % of critical level
Greenacres Meadow LWS	3*	1.606	53.5

* Lowland meadows identified on EASIMAP - grassland selected on APIS. Low and medium altitude hay meadows selected for N deposition. Only one option available for acid deposition. Decision document for V003 states: Based on the conclusions of the applicant's modelling results, the Agency reviewed its sensitive lichen and bryophyte records on Easimap to establish the exact conservation status of the Greenacres Meadow LWS. The map layer did not show any sensitive species record at Greenacres Meadow LWS thus a CLe 3 would be more appropriate to use. This position is still the same on review in July 2022.

Table 7 – Nitrogen deposition

Site	Critical load kg N/ha/yr. *	Predicted PC kg N/ha/yr.	PC % of critical load
Greenacres Meadows LWS	15	8.339	55.6

* Critical load values taken from APIS website (www.apis.ac.uk) – Calcareous grassland selected as EASIMAP states this site is unimproved neutral to calcareous grassland (and grassland has a lower critical load (15) opposed to neutral grassland (20) – July 2022.

Table 8 – Acid deposition

Site	Critical load keq/ha/yr*	Predicted PC keq/ha/yr.	PC % of critical load
Greenacres Meadows LWS	4.928	0.596	12.1

* Critical load values taken from APIS website (www.apis.ac.uk) – July 2022.

No further assessment is required.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
The facility	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility'.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
The site	
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.
Biodiversity, heritage, landscape, and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape, or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape, and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape, and heritage, and/or protected species or habitats identified.</p>
Environmental risk assessment	
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p> <p>The operating techniques are as follows:</p> <ul style="list-style-type: none"> All poultry houses are ventilated by roof fans with an emission point higher than 5.5 metres above ground level and an efflux speed greater than 11

Aspect considered	Decision
	<p>metres per second.</p> <ul style="list-style-type: none"> • Manure is removed by belts from all three poultry houses twice each week. Litter is removed into a covered trailer and removed from site – manure isn't stored on site. • Wash from the wash out of poultry houses is channelled to underground collection tanks close to the houses to await export off site. • Roof water from all three houses and water draining from the yard to the south of the houses (excluding periods of washout when water from the yard drains to the underground tank) drain to the attenuation pond, from where it is piped to a drainage ditch to the west of the site. • Clean water from the yard (excluding periods of washout when water from the yard drains to the underground tank) to the north of the houses will be discharged to the ditch to the west of the site. • There will be a standby generator with integrated diesel storage tank. • LPG heaters are used to heat the poultry houses. • Mortalities are collected daily and stored in a secure container on site for removal by a licensed collection agent. <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs.</p>
Odour management	<p>We have reviewed the odour management plan in accordance with our guidance on odour management.</p> <p>We consider that the odour management plan is satisfactory.</p>
Noise management	<p>We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.</p> <p>We consider that the noise management plan is satisfactory.</p>
Permit conditions	
Updating permit conditions during consolidation	<p>We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit(s).</p>
Use of conditions other than those from the template	<p>Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.</p>
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p>
Reporting	<p>We have specified reporting in the permit.</p>
Operator competence	
Management system	<p>There is no known reason to consider that the operator will not have the</p>

Aspect considered	Decision
	management system to enable it to comply with the permit conditions.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>